

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE NO.**

DUSTIN CARPENTER,
Plaintiff,

Judge
Magistrate Judge

vs.

TRANS UNION LLC; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION
SERVICES, LLC; SYNCHRONY
BANK d/b/a CARECREDIT d/b/a
CARECREDIT.COM; and
CARECREDIT, LLC;
Defendants.

TRANS UNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, on the following grounds:

1. Plaintiff Dustin Carpenter served Trans Union on or about July 30, 2021 with a Summons and Complaint to be filed in the 4th Judicial District Court, Hennepin County, Minnesota. Copies of the Summons and Complaint are attached hereto, as **Exhibit A**, and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Attached hereto as **Exhibit C** is a copy of Trans Union, LLC's Notice of Filing Notice Of Removal With the United States District Court to be filed in Hennepin County District Court.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 43-52.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. As of the date of this Notice of Removal, Defendants Equifax Information Services, LLC ("Equifax"), Synchrony Bank d/b/a CareCredit d/b/a CareCredit.com ("Synchrony") and CareCredit LLC ("CareCredit") have been served. Counsel for Trans Union has contacted counsel for Equifax, Synchrony and CareCredit, who have consented to this removal as evidenced by consents attached hereto as **Exhibit D**, **Exhibit E**, and **Exhibit F**, respectively. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court for the District of Minnesota.

7. Notice of this removal will promptly be filed with the 4th Judicial District Court, Hennepin County, Minnesota and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota to this United States District Court, District of Minnesota.

Respectfully submitted,

Date: 8/27/2021

s/ Bradley D. Fisher

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